



LARRY AGRAN, Mayor

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May 15, 2002

Mr. Craig J. Wilson, Chief
Monitoring and TMDL Listing Unit
Division of Water Quality
State Water Resources Control Board
P.O. Box 100
Sacramento, CA 95812-0100

Subject: Update of the Section 303(d) List for Santa Ana Region 8

Dear Mr. Wilson:

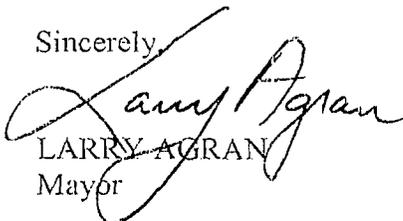
The City of Irvine has completed a preliminary review of the Santa Ana Regional Water Quality Control Board's Section 303(d) List recommendations. We understand that decisions made by the State Water Resources Control Board relative to adding additional water bodies to the 303(d) List will have an impact on all the stakeholders within the Newport Bay/San Diego Creek Watershed. We are confident that the Board's actions relative to updating the 303(d) List will result in regulatory requirements that are fair and reasonably achievable by the stakeholders.

Of particular concern to the City of Irvine is the listing of Reach 1 of the San Diego Creek as impaired due to the presence of fecal coliform. Coupled with this concern are the proposed MUN, REC 1 and REC 2 beneficial uses for water bodies currently under consideration by the Santa Ana Regional Water Quality Control Board as part of their triennial review of the Santa Ana River Basin Plan.

The Irvine City Council is concerned that the Santa Ana Regional Water Quality Control Board's Total Maximum Daily Load (TMDL) program will be compromised unless reasonable classifications for various water bodies such as flood control channels and small creeks are approved. For example, urban flood control channels were never designed or intended for swimming. Therefore, I am sending you this letter, on behalf of the City Council, requesting that the State Water Resources Control Board direct your staff to seriously consider the above-referenced concerns to ensure that the adopted 303(d) List will not burden stakeholders with unattainable objectives. Our City staff along with other co-permittees in the Santa Ana River Basin is available to assist with this effort.

Working with these agencies, I'm confident the updated 303(d) List will be reasonable and give the TMDL program an excellent foundation.

Sincerely,


LARRY AGRAN
Mayor